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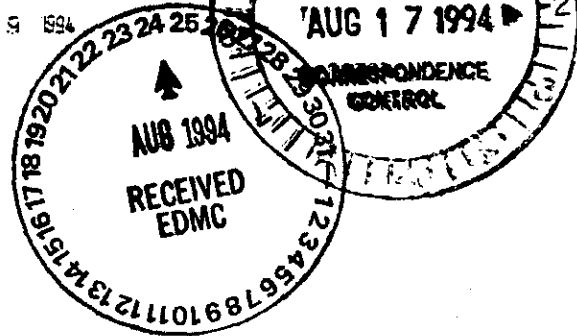
## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

94-RPS-278

JUL 19 1994

Mr. David C. Nylander  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
P.O. Box 1386, MSIN N1-05  
Richland, Washington 99352



Dear Mr. Nylander:

### DISCHARGE OF LIQUID EFFLUENT RETENTION FACILITY HYDROTESTING WATER TO 216-B-3 EXPANSION POND SYSTEM

- References: (1) Letter, J. D. Bauer, RL, to D. B. Butler, Ecology, 37539  
"Discharge of Liquid Effluent Retention Facility Hydrotest Water to the 216-B-3 Pond System," EAP:RNK, dated October 21, 1993.
- (2) Letter, R. D. Izatt, RL, to D. B. Jansen, Ecology, ✓ 19240  
"Discharges of Liquid Effluent Retention Facility Hydrotesting Water to B Pond," EAP:SDS, dated February 19, 1992.
- (3) Letter, E. A. Bracken, RL, to T. L. Nord, Ecology, 15082  
"Discharge of Grout Vault Hydrotesting Water to B Pond," ERD:LSM, dated July 18, 1991.

This letter is to inform the State of Washington Department of Ecology (Ecology) of the U.S. Department of Energy, Richland Operations Office (RL) plan to discharge hydrotest water from the Liquid Effluent Retention Facility (LERF) to the 216-B-3 Expansion Pond System. This discharge is consistent with similar hydrotest discharges to the 216-B-3 Expansion Pond System that have previously been identified to your department (References 1, 2, 3). Verbal notification for this discharge has previously been given to Ms. M. Selby of your staff.

The hydrotest was completed on July 17, 1994. Following the completion of the test, approximately 6.5 million gallons of water from the LERF will be discharged to the 216-B-3 Expansion Pond System. The discharge is scheduled to begin the week of July 18, 1994, and is expected to be completed by August 31, 1994.

Past practice for similar discharges had indicated that a permit was not necessary, and discharges were conducted after notification. However, Ecology has since developed an abbreviated permit application in order to permit these types of discharges. The recently adopted procedure provides for an application to be submitted 60 days prior to discharge. However, since the form and permitting guidance did not exist until recently, the current project schedule does not allow for the full 60-day notification. It

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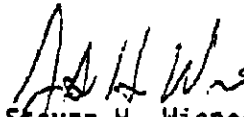
is our further understanding that continued use of the 216-B-3 Expansion Pond System for discharge of hydrotest water in accordance with the schedule set forth above is consistent with the interim operating restrictions and authorizations contained in consent Order No. DE 91NM-177.

Consistent with actions taken to support the previous discharges of hydrotest water, RL evaluated the hydrotest procedure to determine whether or not the water could become a dangerous waste. The water used for the hydrotest will come from the Columbia River via the export line (raw water) that services the 200 East Area. During the hydrotest the water will be in contact with the LERF liner. The LERF liner is composed of high density polyethylene. RL concluded that it is unlikely that any chemical constituents will leach from the liner during the hydrotest. The water will not contact any other potential dangerous waste constituents during the hydrotest. Therefore, the water discharged to the 216-B-3 Expansion Pond System will not be a dangerous waste.

The environmental impacts of the LERF were addressed in the State Environmental Policy Act (SEPA) Checklist submitted to Ecology as an appendix to the LERF Notice of Intent. Ecology notified RL that Ecology had made a SEPA Determination of Nonsignificance in an April 6, 1990, letter.

Should you have any questions, please contact me or Mr. J. E. Rasmussen of my staff on (509) 376-2247.

Sincerely,

  
Steven H. Wisness, Acting Program Manager  
Office of Environmental Assurance,  
Permits, and Policy

EAP:JET

Enclosure:  
SWDP Application

cc w/encl:  
Administrative Records  
W. Burke, CTUIR  
R. Jim, IN  
D. Powauke, NPT  
M. Selby, Ecology  
J. Wallace, Ecology  
D. Sherwood, EPA

cc w/o encl:  
W. Dixon, WHC  
J. Luke, WHC  
F. Ruck, WHC  
R. Stanley, Ecology

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

S. H. Wisness, RL  
(E. M. Greager, WHC)

D. C. Nylander, Ecology

Incoming: 9404876  
(Xref: 9454193D)

Subject: DISCHARGE OF LIQUID EFFLUENT RETENTION FACILITY HYDROTESTING WATER TO  
216-B-3 EXPANSION POND SYSTEM

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